

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ART ASSURE LTD., LLC,	:
Plaintiff,	:
-against-	:
	14 CV 3756 (LGS)
ARTMENTUM GMBH, MICHAEL SCHULZ, THOMAS	:
BURKHALTER, ELIANE PIDOUX, INTERNATIONAL	:
CORPORATE ART CONSULTING, KEVIN WYNN,	:
KLAUS MACIEJEWSKI, HANS-BERT MOLL, and DZ	:
PRIVATBANK (SCHWEIZ) AG,	:
Defendants.	:
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**SUPPLEMENTAL DECLARATION OF KEVIN WYNN**  
**IN OPPOSITION TO CROSS MOTION FOR DISCOVERY**

I, Kevin Wynn, hereby depose and state under the penalties of perjury pursuant to 28 U.S.C. § 1746:

1. I am over eighteen years old, and I make this affidavit based on my personal knowledge.
2. I understand that Asher Edelman filed an affidavit on August 9, 2014 ("Edelman Affidavit").
3. Mr. Edelman makes two assertions about Robert Steele, namely that: (1) I "maintain[] a direct relationship with Robert Steele, a gallery owner in New York" (Edelman Affidavit at ¶ 15); and (2) "Artmentum also approached Robert Steele Gallery in New York about this same transaction as was included in the Contract" (*Id.* at ¶ 66).

*KW*

4. I have been an acquaintance of Robert Steele for several years, but I have no affiliation or direct business relationship to him. I am not an employee or agent of any business with which he is affiliated.

5. To the best of my knowledge, understanding and belief, the Robert Steele Gallery closed in August or September of 2009.

6. Mr. Edelman's description of my interaction with Mr. Steele in connection with the transaction in this case is exactly backwards. It was Mr. Steele who advised me that he (Mr. Steele) had heard from a certain Al Holland, who was attempting to sell the very collection of art at issue in this case.

7. Although I did not know it at the time of this interaction with Mr. Steele, it is now my understanding that Mr. Holland is the CEO of First Dallas Merchant Banque, and that it was he who signed the July 18, 2013 letter to DZ Privatbank (Schweiz) AG that is Exhibit D to Mr. Edelman's affidavit.

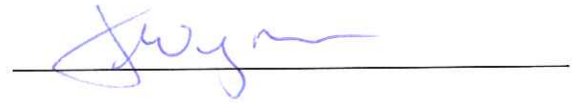
8. I attended a meeting in Frankfurt, Germany in September of last year as Artmentum GmbH and Mr. Edelman continued to negotiate the potential transaction. At that meeting, I mentioned to Mr. Edelman that Mr. Holland was trying to sell the collection.

9. Mr. Edelman responded that Mr. Holland was a member of "the crazy Christian Right," or words to that effect.

10. On August 9, 2014, Mr. Edelman copied me on an e-mail to Kelly Crow at the Wall Street Journal that also attached the affidavit filed by Silvio Schneider in this case.

Pursuant to 28 U.S.C. § 1746, I declare (or certify, verify, or state) under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed in FRANKFURT under the pains and penalty of perjury this 26 day of August, 2014.



Kevin Wynn